

**BOBBY JINDAL**  
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**HAROLD LEGGETT, PH.D.**  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20080002  
Agency Interest No. 17904

Mr. Wayne Ahrens  
Plant Manager  
PO Box 2449  
Sulphur, LA 70664-2449

RE: Part 70 Operating Permit Renewal/Modification, Westlake Styrene, LLC, Styrene Marine Terminal, Sulphur, Calcasieu Parish, Louisiana

Dear Mr. Ahrens:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_\_ of \_\_\_\_\_, 2014, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2009.

Permit No.: 0520-00156-V2

Sincerely,

Cheryl Sonnier Nolan  
Assistant Secretary

CSN:ALR  
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET  
AIR PERMITS DIVISION  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Styrene Marine Terminal  
Agency Interest No.: 17904  
Westlake Styrene, LLC  
Sulphur, Calcasieu Parish, Louisiana**

**I. Background**

Westlake Styrene LLC, Styrene Marine Terminal, an existing Styrene Terminal facility began operation in June 1, 1991. The Styrene Marine Terminal has operated under Permit No. 0520-00156-00, issued June 1, 1991 and Permit No. 0520-00156-V0, issued June 11, 2004. The Styrene Marine Terminal currently operates under Permit No. 0520-00156-V1, issued April 13, 2007 and amended on October 19, 2007.

This is the Part 70 operating permit for the facility.

**II. Origin**

A permit application and Emission Inventory Questionnaire were submitted by Westlake Styrene, LLC on December 5, 2008 requesting a Part 70 operating permit renewal/modification, additional information was submitted on June 4, 2009.

**III. Description**

The Westlake Styrene Terminal supports the operation of the Styrene Monomer Manufacturing Facility located at the Westlake Petrochemical Complex. The Styrene Marine Terminal consists of storage tanks for styrene monomer product and benzene feedstock as well as loading and unloading facilities to transfer materials onto and/or from ships, barges, and railcars as required. The terminal also includes a collection and storage system for contaminated storm water and a flare to control Py Gas Loading. Associated utilities include fire/utility water, chilled water, nitrogen, and an ammonia refrigeration system.

**Styrene Monomer System**

Styrene product from the Westlake Styrene Monomer Production Facility is transported through an eight-inch pipeline at 1,400 gallons per minute (gpm) to the styrene monomer storage tank, MT-700 (EPN 2-90). This 5 million gallon storage tank holds about 31 days' production. It is internally coated to prevent product discoloration and to reduce the formation of polymers on the roof and shell. The tank shell is insulated with three inches of cellular glass or sprayed-on polyurethane to help maintain the required storage temperature. In order to prevent polymerization during transportation and storage of the styrene monomer product, the tank contents are maintained at a temperature of 50-65 °F by means of a liquid chiller (TT-701) and a vapor chiller (TT-700). The reduced storage temperature also reduces air emissions by reducing the vapor pressure of the stored liquid. The liquid chiller is cooled by an ammonia refrigeration system. Styrene product is pumped through the liquid chiller is cooled by an ammonia

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refrigeration system. Styrene product is pumped through the liquid chiller and back to the tank or to the dock and then back to the tank. The pipeline is circulated by flushing the contents periodically between the product storage tank at the styrene monomer facility and the terminal storage facility. The piping is designed to allow for either continuous or periodic circulation through all transfer lines to reduce the possibility of polymer formation.

Styrene monomer is loaded onto the ships or barges at platform No. 2 of the CII Coke Plant ship dock. An eight-inch marine loading arm facilitates hookups to both ships and barges. Emergency shutdown valves are located in the load line of the platform and on the shore to stop the flow in the event of a line rupture, fire, or other unsafe condition. The styrene monomer is pumped to the dock by load pumps PP-700 A/B at a maximum rate of 1800 gpm. At this rate, a 5,000 metric ton ship could be loaded in about four hours. A vapor collection system that routes vapors to a carbon canister for control reduces emissions from the loading operation. The ships and barges loaded are leak-tested annually in accordance with Coast Guard regulations.

Styrene monomer is also loaded onto railcars from a loading rack adjacent to the tank farm area. Loading vapors are controlled by carbon adsorption (EPN 2-07).

Fugitive emissions from the equipment leaks from pumps, valves, flanges, and pressure relief valves in styrene service are included in EPN 6-90.

**Benzene System**

Benzene is one of the feedstocks required for the production of styrene monomer. At the Styrene Marine Terminal, benzene is received by pipeline or unloaded from barges, stored at the terminal and then transferred by pipeline to the Styrene Monomer Manufacturing Facility at the Westlake Petrochemical Complex.

Benzene feedstock that arrives by barge is unloaded through an eight-inch marine loading arm and pumped from the barge through an eight-inch pipeline and transferred directly into the tank. From the tank, benzene is pumped through a four-inch pipeline to the Styrene Monomer Manufacturing Facility. Tank MT-704A is equipped with an internal floating roof to reduce air emissions of benzene. The tank is vented to a carbon canister to further reduce benzene emissions.

Fugitive emissions from equipment leaks from pumps, valves, flanges, and pressure relief valves in benzene service are included in EPN 6-90.

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**Py GAS System**

Py Gas is received by pipeline from the Ethylene Plants located at the Westlake Petrochemical Complex and loaded via barges and ships for offsite sales. The emissions generated during loading operations are routed to the Py Gas Loading Flare (EN 1-07). Fugitives associated with the Py Gas System are permitted in the Petro 2 Part 70 permit.

**Storm Water and Utilities Systems**

Potentially contaminated storm water is collected in one of two 500-gallon working capacity covered sumps. One sump (EPN 12-90) is located at the pump pad and the other (EPN 10-90) is located at the ship dock loading platform. The pumps discharge to the contaminated storm water tank, MT-709 (EPN 4-90). Contaminated storm water is removed from the tank by vacuum truck and transported off site for treatment. Non-contaminated storm water may form an oil layer on the surface of the sumps and tank, air emissions have been conservatively estimated based on a composition of 50% benzene and 50% styrene.

An ammonia refrigeration system is used to cool the liquid chiller (TT-701). Because the system is sealed, fugitive emissions of ammonia are not expected. The ammonia refrigeration system is listed as an insignificant source.

Utilities at the terminal also include a diesel-fired firewater pump (8-90). Diesel fuel is stored in Tank MT-710 (EPN IA-1), which is listed as an insignificant emission source.

This permit is a renewal of Permit No. 0520-00156-V1 issued on October 19, 2007. This permit also authorizes an extension to Westlake's authority to construct the Py Gas Loading Facility which was previously approved as part of the Py Gas Pipeline Project under Permit No. 0520-00156-V1 issued April 13, 2007. Westlake has not begun construction of the new facility due to market concerns but has requested to retain the authority to construct the facility beyond the allowed 2-year window to start construction which will expire in the second quarter of 2009. This permit will extend that dead line to two years from the issuance of this permit.

Furthermore, specific requirement No. 34 in Permit No. 0520-00156-V1, issued October 19, 2007 has been removed. This specific requirement identifies control requirements from the Marine Tank Vessel Loading Operations MACT Standard. This flare is not subject to the control requirements of the MACT Standard, only recordkeeping requirements. This is based on the understanding that this is considered an existing marine terminal, and not a new marine terminal.

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Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	0.11	0.11	-
SO <sub>2</sub>	0.12	0.12	-
NO <sub>x</sub>	2.66	2.66	-
CO	6.12	6.11	-0.01
VOC *	13.67	13.68	+0.01

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
1,3-Butadiene	0.18	0.18	-
Benzene	0.31	0.30	-0.01
Ethyl Benzene	0.01	0.01	-
Formaldehyde	0.01	0.01	-
Styrene	10.88	10.87	-0.01
Toluene	0.03	0.03	-
Total	11.42	11.40	-0.02

Other VOC (TPY): 2.25

**IV. Type of Review**

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

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This facility is part of a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

**VII. Effects on Ambient Air**

Emissions associated with the proposed permit renewal were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard)

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{NAAQS})

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**VIII. General Condition XVII Activities**

Work Activity	Emission Rates - tons				
	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>X</sub>	CO	VOC
Maintenance Activities and inspections					<0.01
Filter/Strainer Cleaning or Changeout					<0.01
Sampling Activities					<0.01
Vacuum Truck Transfers					0.03
Frac Tank and Vacuum Truck Cleanout					<0.01
Tank Hatch Opening					<0.01

**IX. Insignificant Activities**

ID No.:	Description	Citation
IA-1	Diesel Fuel Storage Tank (MT-710)	LAC 33:III.501.B.5.A.3.
IA-8	Ammonia Chiller	LAC 33:III.501.B.5.A.4

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III Chapter												51*	56	59*	
		5▲	9	11	13	15	2103	2107	2108	2111	2113	2121	2122				
UNF0001	Entire Facility		1							1	1				1	1	3
EQT0001	1-90 Benzene Storage Tank MT-704A						1									1	
EQT0002	2-90 Styrene Monomer Storage Tank MT-700						3									1	
EQT0003	4-90 Contaminated Stormwater Storage Tank MT-709						3									1	
EQT0004	5b-90 Barge Loading/Unloading Operation						3									1	
FUG0001	6-90 Fugitive Hydrocarbon Emissions											3		2	1		
EQT0005	8-90 Emergency Diesel Firewater Pump		1		2												
EQT0006	10-90 Ship Dock Collection Sump														1		
EQT0007	12-90 Terminal Facility Collection Sump														1		
EQT0008	1-07 Py Gas Loading Flare				1	1	2			3					1		
EQT0009	2-07 Railcar Loading									3					1		

\* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

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**KEY TO MATRIX**

- 1 -The regulations have applicable requirements that apply to this particular emission source.
  - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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**XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.	Description	40 CFR 60 NSPS			40 CFR 61 NESHAP			40 CFR 63 MACT			40 CFR						
		A	Db	Kb	VV	A	J	V	BB	FF	F	G	H	EEEE	YY	Y	64
UNF0001	Entire Facility	1			1					1	1						3
EQT0001	1-90 Benzene Storage Tank MT-704A	1		1							1						3
EQT0002	2-90 Styrene Monomer Storage Tank MT-700			3							1						3
	4-90 Contaminated Stormwater Storage Tank MT-709			3					1								
EQT0004	5b-90 Barge Loading/Unloading Operation								3		3						3
FUG0001	6-90 Fugitive Hydrocarbon Emissions										1						2
EQT0005	8-90 Emergency Diesel Firewater Pump																
EQT0006	10-90 Ship Dock Collection Sump				3						1						
EQT0007	12-90 Terminal Facility Collection Sump				3						1						
EQT0008	1-07 Py Gas Loading Flare											3					2
EQT0009	2-07 Railcar Loading								3		1						3

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- 1 -The regulations have applicable requirements that apply to this particular emission source.
  - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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**XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes
UNF0001 – Entire Facility	Chemical Accident Prevention Provisions 40 CFR 68, Subpart B	DOES NOT APPLY – No Substances present on site above the threshold quantity
	Chemical Accident Prevention and Minimization of Consequences LAC33:III.59	DOES NOT APPLY – No Substances present on site above the threshold quantity
EQT0001 – 1-90 Benzene Storage Tank	MACT EEEE Organic Liquids Distribution 40 CFR 63.2330	DOES NOT APPLY – Considered part of styrene loading CMPPU.
EQT002 – 2-90 Styrene Storage Tank	Storage of VOC LAC 33:III.2103.B	DOES NOT APPLY – The vessel stores volatile organic compounds with a maximum true vapor pressure < 1.5 psia
	NSPS Subpart Kb for VOC storage tanks 40 CFR 60.110b(a)	DOES NOT APPLY – Tank capacity is >40,000 gallons and its partial pressure of VOCs is <0.51 psia
	MACT EEEE Organic Liquids Distribution 40 CFR 63.2330	DOES NOT APPLY – Considered part of styrene loading CMPPU.
EQT003 – 4-90 Storm Water Storage Tank	Storage of VOC LAC 33:III.2103.B	DOES NOT APPLY – The vessel stores volatile organic compounds with a maximum true vapor pressure < 1.5 psia

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ID No:	Requirement	Notes
EQT003 – 4-90 Storm Water Storage Tank	NSPS Subpart Kb for VOC storage tanks 40 CFR 60.110b(a)	DOES NOT APPLY – Tank capacity is >40,000 gallons and its partial pressure of VOCs is <0.51 psia
EQT004 – 5b-90 Styrene Loading/Benzene Unloading	VOC Loading LAC 33:III.2107.B	DOES NOT APPLY – Regulations do not apply to ship and barge loading operations.
	NESHAP Subpart BB - Benzene Transfer Operations 40 CFR 61.302	DOES NOT APPLY – Regulations do not apply to styrene loading or benzene unloading.
	MACT EEEE Organic Liquids Distribution 40 CFR 63.2330	DOES NOT APPLY – Considered part of styrene CMPU.
	NESHAP (HON) Subpart G 40 CFR 63.126(c)	DOES NOT APPLY – Marine loading facilities do not meet the definition of transfer rack as defined by the HON; therefore, are not regulated by the HON.
	NESHAP Subpart Y - Marine Tank Vessel Loading Operations 40 CFR 63.560(d)	DOES NOT APPLY – Vapor pressure <1.5 psia

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ID No.	Requirement	Notes
FUG001 – 6-90 Fugitives	Fugitive Emission Control LAC 33:III.2121	DOES NOT APPLY – As of January 1, 2003, sources located in Calcasieu Parish are subject to LAC 33:III.2122 instead of LAC 33:III.2121.
	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	EXEMPT – Westlake has established a consolidated monitoring program in which the facility is to comply with applicable HON requirements.
	MACT EEEE Organic Liquids Distribution 40 CFR 63.2330	DOES NOT APPLY – Considered part of styrene CMPU.
	NESHAP Subpart Y – Marine Tank Vessel Loading Operations 40 CFR 63.560(d)	DOES NOT APPLY – Vapor Pressure < 1.5 psia
	NESHAP (MON) Subpart FFFF 40 CFR 63.2435(b)(3)	DOES NOT APPLY – Regulated under Subpart YY, Ethylene MACT and HON
EQT005 – 8-90 Firewater Pump Engine	Emission Standards for Sulfur Dioxide LAC 33:III.1503	EXEMPT – Emissions must not emit SO <sub>2</sub> in excess of 250 tpy

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**XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes
EQT006 – 10-90 Ship Dock Collection Sump	NSPS Subpart Kb for VOC storage Tanks 40 CFR 60.110b(a)	DOES NOT APPLY. Tank capacity is less than 75 cubic meters.
	NESHAP (HON) Subpart G 40 CFR 63.126	DOES NOT APPLY. Marine loading facilities do not meet the definition of transfer rack as defined by the HON; therefore, are not regulated by the HON.
EQT007 – 12-90 Terminal Facility Collection Sump	NSPS Subpart Kb for VOC storage Tanks 40 CFR 60.110b(a)	DOES NOT APPLY. Tank capacity is less than 75 cubic meters.
	NESHAP (HON) Subpart G 40 CFR 63.126	DOES NOT APPLY. Marine loading facilities do not meet the definition of transfer rack as defined by the HON; therefore, are not regulated by the HON.
EQT008 – 1-07 Flare	Emission Standards for Sulfur Dioxide LAC 33.III.1503.C	EXEMPT. This source emits <250 tpy of sulfur compounds measured as SO <sub>2</sub> .
	Marine Vapor Recovery LAC 33.III.2108	DOES NOT APPLY. Loading Facility emits <100 tpy of VOCs

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**XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes
EQT008 - 1-07 Flare	MACT EEEE Organic Liquids Distribution 40 CFR 63.2338(c)(1)  NESHAP (MON) Subpart FFFF 40 CFR 63.1250	DOES NOT APPLY. Regulations do not apply to ship and barge loading operations.
NESHAP (Ethylene MACT) Subpart YY 40 CFR 63.1100		DOES NOT APPLY. Regulations do not apply to ship and barge loading operations.
CAM 40 CFR Part 64		DOES NOT APPLY. This unit is not an affected category as defined by 40 CFR 63.1103(a) through (h)
		EXEMPT. All potentially subject sources in this unit are subject only to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act, therefore, this rule is not applicable per 40 CFR 64.2(b)(1)(J).
EQT009 - 2-07 Railcar Loading	VOC Loading LAC 33.III.2107  NESHAP Subpart BB - Benzene Transfer Operations 40 CFR 61.302	DOES NOT APPLY. VOC's loaded have a TVP < 1.5 psia
EQT009 - 2-07 Railcar Loading	MACT EEEE Organic Liquids Distribution 40 CFR 63.2338(c)(1)	DOES NOT APPLY. Regulations do not apply to styrene loading or benzene unloading.
		DOES NOT APPLY. Considered part of styrene CMPU.

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The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AJ ID: 17904 - Westlake Styrene LLC - Marine Terminal  
 Activity Number: PER20080002  
 Permit Number: 0520-00156-V2

**Air - Title V Regular Permit Renewal**

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
<b>Entire Facility</b>															
EQT 0001 1.90													0.01		0.06
EQT 0002 2.90													2.22		9.72
EQT 0003 4.90													0.03		0.11
EQT 0004 5.90													0.11		1.08
EQT 0005 8.90	<b>4.41</b>	<b>4.41</b>	<b>0.34</b>	<b>20.46</b>	<b>20.46</b>	<b>1.60</b>	<b>1.45</b>	<b>0.11</b>	<b>1.35</b>	<b>0.11</b>	<b>1.35</b>	<b>0.11</b>	<b>1.66</b>	<b>1.66</b>	<b>0.13</b>
EQT 0006 10.90													0.01		0.03
EQT 0007 12.90													0.01		0.03
EQT 0008 1.07		<b>1.32</b>	<b>40.33</b>	<b>5.77</b>	<b>0.24</b>	<b>7.41</b>	<b>1.06</b>		<0.01	<b>0.03</b>	<b>0.01</b>	<b>0.55</b>	<b>29.02</b>	<b>2.39</b>	
EQT 0009 2.07													0.02	<b>0.14</b>	0.08
FUG 0001 6.90													0.16		0.63

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 17904 - Westlake Styrene LLC - Marine Terminal

Activity Number: PER20080002

Permit Number: 0520-00156-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0001 1-90	Benzene	0.01		0.06
EQT 0002 2-90	Styrene	2.22		9.72
EQT 0003 4-90	Benzene	0.02		0.10
	Styrene	<0.01		0.01
EQT 0004 5b-90	Styrene	0.11	1.08	0.50
EQT 0005 8-90	Formaldehyde	0.31	0.31	0.02
EQT 0006 10-90	Benzene	0.01		0.02
	Styrene	<0.01		<0.01
EQT 0007 12-90	Benzene	0.01		0.02
	Styrene	<0.01		<0.01
EQT 0008 1-07	1,3-Butadiene	0.04	2.38	0.18
	Acetaldehyde	<0.01	<0.01	<0.01
	Acrolein	<0.01	<0.01	<0.01
	Benzene	0.01	0.50	0.03
	Ethyl benzene	<0.01	0.02	0.01
	Formaldehyde	<0.01	<0.01	0.01
	Naphthalene	<0.01	<0.01	<0.01
	Styrene	<0.01	0.07	<0.01
	Toluene	0.01	0.50	0.03
	Xylene (mixed isomers)	<0.01	0.01	<0.01
EQT 0009 2-07	n-Hexane	<0.01	<0.01	<0.01
	Styrene	0.02	0.14	0.08
FUG 0001 6-90	Benzene	0.02		0.07
	Styrene	0.13		0.56
UNF 0001 Entire Facility	1,3-Butadiene			0.18
	Acetaldehyde			<0.01
	Acrolein			<0.01
	Benzene			0.30
	Ethyl benzene			0.01
	Formaldehyde			0.01
	Naphthalene			<0.01
	Styrene			10.87
	Toluene			0.03

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 17904 - Westlake Styrene LLC - Marine Terminal

Activity Number: PER20080002

Permit Number: 0520-00156-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0001 Entire Facility	Xylene (mixed isomers)			<0.01
	n-Hexane			<0.01

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

## SPECIFIC REQUIREMENTS

AI ID: 17904 - Westlake Styrene LLC - Marine Terminal  
Activity Number: PER20080002  
Permit Number: 0520-00156-V2  
Air - Title V Regular Permit Renewal

EQT 0001 1-90 - Benzene Storage Tank MT-704A

- Vessel is Group 2 HON tank and is only required to comply with the HON. 40 CFR 63 Subpart G.

Internal floating roof: Equip each internal floating roof with a closure device between the wall of the storage vessel and the roof edge. Closure device shall consist of one of the devices listed in 40 CFR 63.119(b)(3)(i) through (b)(3)(iii), except as specified in 40 CFR 63.119(b)(3)(iv).

Subpart G. [40 CFR 63.119(b)(3)]

Internal floating roof: Ensure that automatic bleeder vents are closed at all times when the roof is floating, except when the roof is being floated off or is being landed on the roof leg supports. Subpart G. [40 CFR 63.119(b)(4)]

Internal floating roof: Ensure that each internal floating roof meets the specifications listed in 40 CFR 63.119(b)(5)(i) through (b)(5)(vii), except as provided in 40 CFR 63.119(b)(5)(viii). Subpart G. [40 CFR 63.119(b)(5)]

Internal floating roof: Ensure that each cover or lid on any opening in the internal floating roof is closed except when the cover or lid must be open for access. Ensure that covers on each access hatch and each gauge float well are bolted or fastened so as to be air-tight when they are closed. Rim space vents are to be set to open only when the internal floating roof is not floating or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting. Subpart G. [40 CFR 63.119(b)(6)]

Internal floating roof: Ensure that the internal floating roof is floating on the surface at all times except when the floating roof must be supported by the leg supports during the periods specified in 40 CFR 63.119(b)(1)(i) through (b)(1)(ii). When the floating roof is resting on the leg supports, ensure that the process of filling, emptying or refilling is continuous and accomplished as soon as practical. Subpart G. [40 CFR 63.119(b)]

Tank roof and seals monitored by visual inspection/determination at the regulation's specified frequency. Inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service) according to the schedule specified in 40 CFR 63.120(a)(2) and (a)(3). Subpart G. [40 CFR 63.119(b)]

Which Months: All Year Statistical Basis: None specified

Repair storage vessel or empty and remove from service within 45 calendar days, if during the inspections required by 40 CFR 63.120(a)(2)(i) or (a)(3)(ii), any of the conditions specified in 40 CFR 63.120(a)(4) are found. Subpart G. [40 CFR 63.120(a)(4)]

If any of the conditions listed in 40 CFR 63.120(a)(7) are found during the inspections required by 40 CFR 63.120(a)(2)(ii), (a)(3)(i), or (a)(3)(iii), repair the storage vessel as necessary so that none of the conditions specified exist before filling or refilling the storage vessel with organic HAP. Subpart G. [40 CFR 63.120(a)(7)]

Submit Notification: Due in writing at least 30 calendar days prior to the refilling of each storage vessel to afford DEQ the opportunity to have an observer present, for all the inspections required by 40 CFR 63.120(a)(2)(ii), (a)(3)(i), and (a)(3)(ii). If the inspection required by 40 CFR 63.120(a)(2)(ii), (a)(3)(i), or (a)(3)(ii) is not planned and it could not have been known about 30 calendar days in advance of refilling, submit notification at least 7 calendar days prior to the refilling. Notification can be made by telephone and immediately followed by written documentation demonstrating why the inspection was unplanned. Subpart G. [40 CFR 63.120(a)]

Submit an Initial Notification as required by 40 CFR 63.151(b). Subpart G. [40 CFR 63.122(a)(1)]

Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]

Submit Periodic Reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(d), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(4)]

1 [40 CFR 60. Subpart Kb]

2 [40 CFR 63.119(b)(3)]

3 [40 CFR 63.119(b)(4)]

4 [40 CFR 63.119(b)(5)]

5 [40 CFR 63.119(b)(6)]

6 [40 CFR 63.119(b)]

7 [40 CFR 63.120(a)(1)]

8 [40 CFR 63.120(a)(4)]

9 [40 CFR 63.120(a)(7)]

10 [40 CFR 63.120(a)]

11 [40 CFR 63.122(a)(1)]

12 [40 CFR 63.122(a)(3)]

13 [40 CFR 63.122(a)(4)]

**SPECIFIC REQUIREMENTS**

AI ID: 17904 - Westlake Styrene LLC - Marine Terminal  
 Activity Number: PER20080002  
 Permit Number: 0520-00156-V2  
 Air - Title V Regular Permit Renewal

**EQT 0001 1-90 - Benzene Storage Tank MT-704A**

- 14 [40 CFR 63.122(a)(5)]  
 Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(5)]
- 15 [40 CFR 63.123]  
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G.
- 16 [LAC 33:III 2103.B]  
 Equip with a submerged fill pipe.
- 17 [LAC 33:III 2103.C.1.b]  
 Equip internal floating roof with a mechanical shoe seal (metallic-type shoe seal) consisting of a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- 18 [LAC 33:III 2103.C.2]  
 Provide each opening in the internal floating roof (except rim space vents and automatic bleeder vents) with a projection below the liquid surface. In addition, provide each opening (except for leg sleeves, bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains) with a cover equipped with a gasket. Equip automatic bleeder vents and rim space vents with gaskets and equip ladder wells with a sliding cover.
- 19 [LAC 33:III 2103.C]  
 Equip with an internal floating roof consisting of a pontoon type roof, double deck roof, or internal floating cover which will rest or float on the surface of the liquid contents and is equipped with a closure seal to close the space between the roof edge and tank wall. All tank gauging and sampling devices will be gas-tight except when gauging or sampling is taking place.
- 20 [LAC 33:III 2103.H.3]  
 Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H 3.a-e.
- 21 [LAC 33:III 2103.I]  
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 22 [LAC 33:III 5109.A]  
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

**EQT 0002 2-90 - Styrene Monomer Storage Tank MT-709**

- 23 [40 CFR 63.123(a)]  
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]
- 24 [LAC 33:III 5109.A]  
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

**EQT 0003 4-90 - Contaminated Stormwater Storage Tank MT-709**

- 25 [40 CFR 61.342(b)]  
 Comply with requirements of 40 CFR 61.342(c) through (h) no later than 90 days following the effective date, unless a waiver of compliance has been obtained under 40 CFR 61.11, or by the initial startup for a new source with an initial startup after the effective date. Subpart FF. [40 CFR 61.342(b)]
- 26 [LAC 33:III 5109.A]  
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

**EQT 0004 5b-90 - Barge Loading/Unloading Operation**

**SPECIFIC REQUIREMENTS**

**AI ID: 17904 - Westlake Styrene LLC - Marine Terminal**  
**Activity Number: PER20080002**  
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**Air - Title V Regular Permit Renewal**

**EQT 0004 5b-90 - Barge Loading/Unloading Operation**

27 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

**EQT 0005 8-90 - Emergency Diesel Firewater Pump**

28 [LAC 33:III.1101.B]

Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: None specified

**EQT 0006 10-90 - Ship Dock Collection Sump**

29 [40 CFR 61.342(b)]

Comply with requirements of 40 CFR 61.342(c) through (h) no later than 90 days following the effective date, unless a waiver of compliance has been obtained under 40 CFR 61.11, or by the initial startup for a new source with an initial startup after the effective date. Subpart FF. [40 CFR 61.342(b)]

30 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

**EQT 0007 12-90 - Terminal Facility Collection Sump**

31 [40 CFR 61.342(b)]

Comply with requirements of 40 CFR 61.342(c) through (h) no later than 90 days following the effective date, unless a waiver of compliance has been obtained under 40 CFR 61.11, or by the initial startup for a new source with an initial startup after the effective date. Subpart FF. [40 CFR 61.342(b)]

32 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

**EQT 0008 1-07 - Py Gas Loading Flare**

33 [LAC 33:III.1105]

Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.

Which Months: All Year Statistical Basis: None specified

Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:1.3923. Notification is required only if the upset cannot be controlled in six hours.

Submit report: Due in writing to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, within seven calendar days after startup or shutdown, if flaring was not the result of failure to maintain or repair equipment. Submit report if requesting exemption from the provisions of LAC 33:III.1105. Explain the conditions and duration of the startup or shutdown and list the steps necessary to remedy, prevent and limit the excess emissions. Minimize flaring and ensure that no ambient air quality standards are jeopardized.

Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).

Which Months: All Year Statistical Basis: Six-minute average

**SPECIFIC REQUIREMENTS**

AI ID: 17904 - Westlake Styrene LLC - Marine Terminal  
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 Air - Title V Regular Permit Renewal

**EQT 0008 1-07 - Py Gas Loading Flare**

37 [LAC 33.III.5109 A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

**EQT 0009 2-07 - Rail Car Loading**

38 [40 CFR 63.130(h)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.130(h)(1) through (h)(3). Subpart G. [40 CFR 63.130(h)]  
 39 [LAC 33.III.5109 A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

**FUG 0001 6-90 - Fugitive Hydrocarbon Emissions**

- 40 [40 CFR 63.162(c)] Identify each piece of equipment in a process unit such that it can be distinguished readily from equipment that is not subject to 40 CFR 63.162(c). Subpart H. [40 CFR 63.162(f)]
- 41 [40 CFR 63.162(f)] Clearly identify leaking equipment, for leaking equipment detected as specified in 40 CFR 63.163, 40 CFR 63.164, 40 CFR 63.168, 40 CFR 63.169, and 40 CFR 63.172 through 63.174. The identification may be removed after the equipment is repaired, except for valves or for connectors subject to 40 CFR 63.174(c)(1)(i). The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 63.175(e)(Y)(D), and no leak has been detected during the follow-up monitoring. If electing to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. Subpart H. [40 CFR 63.162(f)]
- 42 [40 CFR 63.163(b)(1)] Pumps in light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, except as provided in 40 CFR 63.162(b) and 63.163(e) through (i). If a reading of 10,000 ppm (phase II), or 5,000 ppm (phase III), pumps handling polymerizing monomers), 2,000 ppm (phase III, pumps in food/medical service), or 1,000 ppm (phase III, all other pumps) or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(1)]
- 43 [40 CFR 63.163(b)(3)] Which Months: All Year Statistical Basis: None specified  
 Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate the repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(3)]
- 44 [40 CFR 63.163(c)] Which Months: All Year Statistical Basis: None specified  
 Pumps in light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.163(c)(3) and 40 CFR 63.171. Subpart H. [40 CFR 63.163(c)]
- 45 [40 CFR 63.163(d)(2)] Pumps in light liquid service: Implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176, if, in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak. Subpart H. [40 CFR 63.163(d)(2)]
- 46 [40 CFR 63.163(d)(4)] Pumps in light liquid service: Determine percent leaking pumps using the equation in 40 CFR 63.163(d)(4). Subpart H. [40 CFR 63.163(d)(4)]

**SPECIFIC REQUIREMENTS**

**AI ID: 17904 - Westlake Styrene LLC - Marine Terminal**  
**Activity Number: PER20080002**  
**Permit Number: 0520-00156-V2**  
**Air - Title V Regular Permit Renewal**

**FUG 0001 6-90 - Fugitive Hydrocarbon Emissions**

- 47 [40 CFR 63.163(e)(1)] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-loop system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(1)]
- 48 [40 CFR 63.163(e)(2)] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid service. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(2)]
- 49 [40 CFR 63.163(e)(3)] Pumps in light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(3)]
- 50 [40 CFR 63.163(e)(4)] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, monitor the pump as specified in 40 CFR 63.180(b) to determine if there is a leak of organic HAP in the barrier fluid. If an instrument reading of 1,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(4)]
- Which Months: All Year Statistical Basis: None specified
- Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)(i)]
- 51 [40 CFR 63.163(e)(6)(ii)] Pumps in light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)]
- 52 [40 CFR 63.163(e)(6)] Pumps in light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the pump is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.163(e)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)]
- 53 [40 CFR 63.163(e)] Which Months: All Year Statistical Basis: None specified
- Pumps in light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency. Monitor each pump as often as practicable and at least monthly. Comply with this requirement instead of the weekly visual inspection requirement of 40 CFR 63.163(b)(3) and (e)(4), and the daily requirements of 40 CFR 63.163(e)(5). Subpart H. [40 CFR 63.163(h)]
- 54 [40 CFR 63.163(h)] Which Months: All Year Statistical Basis: None specified
- Pumps in light liquid service (unsafe-to-monitor): Determine that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.163(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(l)(1)]

**SPECIFIC REQUIREMENTS**

**AI ID:** 17904 - Westlake Styrene LLC - Marine Terminal  
**Activity Number:** PER20080002  
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**Air - Title V Regular Permit Renewal**

**FUG 0001 6-90 - Fugitive Hydrocarbon Emissions**

- Pumps in light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(2)]
- Which Months: All Year Statistical Basis: None specified
- Compressors: Equip with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided in 40 CFR 63.162(b) and 40 CFR 63.164(h) and (i). Subpart H. [40 CFR 63.164(a)]
- Compressors: Operate the seal system with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or equip with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid directly into a process stream. Subpart H. [40 CFR 63.164(b)]
- Compressors: Ensure that the barrier fluid is not in light liquid service. Subpart H. [40 CFR 63.164(c)]
- Compressors: Equip each barrier fluid system as described in 40 CFR 63.164(a) through (c) with a sensor that will detect failure of the seal system, barrier fluid system, or both. Subpart H. [40 CFR 63.164(d)]
- Compressors (sensor): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. Subpart H. [40 CFR 63.164(e)(2)]
- Compressors: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.164(g)]
- Compressors (no detectable emissions): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, and at other times requested by DEQ. Comply with this requirement instead of the requirements in 40 CFR 63.164(a) through (h). Subpart H. [40 CFR 63.164(i)(2)]
- Which Months: All Year Statistical Basis: None specified
- Compressors (sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an alarm, unless the compressor is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined under 40 CFR 63.164(e)(2), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.164(g). Subpart H.
- Which Months: All Year Statistical Basis: None specified
- Pressure relief device in gas/vapor service: Organic HAP < 500 ppm above background except during pressure releases, as determined by the method specified in 63.180(c). Subpart H. [40 CFR 63.165(a)]
- Which Months: All Year Statistical Basis: None specified
- Pressure relief devices in gas/vapor service: After each pressure release, return to a condition indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(b)(1)]
- Pressure relief devices in gas/vapor service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) after the pressure release and being returned to organic HAP service, to confirm the condition indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 63.180(c). Subpart H. [40 CFR 63.165(b)(2)]
- Which Months: All Year Statistical Basis: None specified

**SPECIFIC REQUIREMENTS**

**AI ID: 17904 - Westlake Styrene LLC - Marine Terminal**  
**Activity Number: PER20080002**  
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**Air - Title V Regular Permit Renewal**

**FUG 0001 6-90 - Fugitive Hydrocarbon Emissions**

Pressure relief devices in gas/vapor service (rupture disk): After each pressure release, install a new rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.165(a) and (b). Subpart H. [40 CFR 63.165(d)(2)]

Sampling connection systems: Equip with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 63.162(b). Operate the system as specified in 40 CFR 63.166(b). Subpart H.

Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and (e). Ensure that the cap, blind flange, plug or second valve seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. Operate each open-ended valve or line equipped with a second valve in a manner such that the valve on the process fluid end is closed before the second valve is closed. Subpart H.

Valves in gas/vapor service or light liquid service (Phase I): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]

Which Months: All Year Statistical Basis: None specified  
 Valves in gas/vapor service or light liquid service (Phase II): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(c). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]

Which Months: All Year Statistical Basis: None specified  
 Valves in gas/vapor service or light liquid service (Phase III, 2 percent or greater leaking valves): Organic HAP monitored by 40 CFR 60,

Appendix A, Method 21 monthly, as specified in 40 CFR 63.180(b); or implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175 and monitor quarterly. If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(j). If electing to implement a quality improvement program, follow the procedures in 40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]

Which Months: All Year Statistical Basis: None specified  
 Valves in gas/vapor service or light liquid service (Phase III, less than 2 percent leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Permittee may elect to comply with the alternate standards in 40 CFR 63.168(d)(3) and (d)(4). Subpart H. [40 CFR 63.168(d)(2)]

Which Months: All Year Statistical Basis: None specified  
 Valves in gas/vapor service or light liquid service: Determine percent leaking valves using the equation in 40 CFR 63.168(e)(1). Subpart H. [40 CFR 63.168(e)(1)]

Valves in gas/vapor service or light liquid service (after leak repair): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within three months (at least) after repair to determine whether the valve has resumed leaking. Subpart H. [40 CFR 63.168(f)(3)]

Which Months: All Year Statistical Basis: None specified  
 Valves in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.168(f)]

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- 78 [40 CFR 63.168(h)(1)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(1)]
- 79 [40 CFR 63.168(h)(2)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valves as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(2)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(1)]
- 80 [40 CFR 63.168(i)(2)] Valves in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the valves at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(2)]
- Which Months: All Year Statistical Basis: None specified
- Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) if evidence of a potential leak to the atmosphere is found by visible, audible, olfactory, or any other detection method. If a reading of 10,000 ppm for agitators, 5,000 ppm for pumps handling polymerizing monomers, 2,000 ppm for all other pumps (including pumps in food/meat/drink service), or 500 ppm for valves, connectors, instrumentation systems, and pressure relief devices, or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.169(c). Subpart H. [40 CFR 63.169(a)]
- Which Months: All Year Statistical Basis: None specified
- Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.169(c)]
- Surge control vessels and bottoms receivers: Equip with a closed-vent system that routes the organic vapors vented from the surge control vessel or bottoms receiver back to the process or to a control device that complies with the requirements of 40 CFR 63.172, except as provided in 40 CFR 63.162(b), or comply with the requirements of 40 CFR 63 Subpart H Table 2 or Table 3. Subpart H.
- Closed-vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(i)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(ii)]
- Which Months: All Year Statistical Basis: None specified
- 83 [40 CFR 63.169(c)]
- 84 [40 CFR 63.170]
- 85 [40 CFR 63.172(f)(1)(i)]
- 86 [40 CFR 63.172(f)(1)(ii)]

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- 87 [40 CFR 63.172(f)(2)(i)] Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(i)]
- Which Months: All Year Statistical Basis: None specified
- 88 [40 CFR 63.172(f)(2)(ii)] Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified
- 89 [40 CFR 63.172(j)(1)] Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.172(i). Subpart H. [40 CFR 63.172(h)]
- 90 [40 CFR 63.172(j)(2)] Closed-vent system (bypass lines): Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart H. [40 CFR 63.172(j)(2)]
- 91 [40 CFR 63.172(j)(2)] Closed-vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart H. [40 CFR 63.172(j)(2)]
- Which Months: All Year Statistical Basis: None specified
- 92 [40 CFR 63.172(k)(1)] Closed-vent system (unsafe-to-inspect): Demonstrate that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential dangers as a consequence of complying with 40 CFR 63.172(f)(1) or (f)(2). Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(1)]
- 93 [40 CFR 63.172(k)(2)] Closed-vent system (unsafe-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(2)]
- Which Months: All Year Statistical Basis: None specified
- 94 [40 CFR 63.172(l)(1)] Closed-vent system (difficult-to-inspect): Demonstrate that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(l)(1)]
- 95 [40 CFR 63.172(l)(2)] Closed-vent system (difficult-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Maintain a written plan that requires inspection of the equipment at least once every five years. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(l)(2)]
- Which Months: All Year Statistical Basis: None specified
- 96 [40 CFR 63.172(m)] Ensure that the closed-vent system or control device is operating whenever organic HAP emissions are vented to the closed-vent system or control device. Subpart H. [40 CFR 63.172(m)]
- 97 [40 CFR 63.173(a)] Agitators in gas/vapor service or liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(a)]
- Which Months: All Year Statistical Basis: None specified

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- 98 [40 CFR 63.173(b)] Agitators in gas/vapor service or light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar) for indications of liquids dripping from the agitator. If there are indications of liquids dripping from the agitator, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(b)]
- Which Months: All Year Statistical Basis: None Specified
- Agitators in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.173(c)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the agitator stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(1)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid organic HAP service. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(2)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). H. [40 CFR 63.173(d)(3)]
- Agitators in gas/vapor service or light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the agitator seal. If there are indications of liquid dripping from the agitator seal at the time of the weekly inspection, monitor the agitator as specified in 40 CFR 63.180(b) to determine the presence of organic HAP in the barrier fluid. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(4)]
- Which Months: All Year Statistical Basis: None Specified
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)(i)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)]
- Agitators in gas/vapor service or light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the agitator is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.173(d)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)]
- Which Months: All Year Statistical Basis: None Specified

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Agitators in gas/vapor service or light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency. Monitor each agitator as often as practicable and at least monthly. Comply with this requirement instead of the weekly visual inspection requirement of 40 CFR 63.173(b)(1) and (d)(4), and the daily requirements of 40 CFR 63.173(d)(5). Subpart H. [40 CFR 63.173(g)]

Which Months: All Year Statistical Basis: None specified

Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the agitator cannot be monitored without elevating the monitoring personnel more than two meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(1)]

Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the agitator at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(3)]

Which Months: All Year Statistical Basis: None specified

Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the agitator is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.173(a) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(1)]

Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the agitator as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(2)]

Which Months: All Year Statistical Basis: None specified

Connectors in gas/vapor service or light liquid service (0.5% or greater leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Subpart H. [40 CFR 63.173(j)(2)]

Which Months: All Year Statistical Basis: None specified

Connectors in gas/vapor service or light liquid service (less than 0.5% leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every two years. Subpart H. [40 CFR 63.174(b)(3)(ii)]

Which Months: All Year Statistical Basis: None specified

Connectors in gas/vapor service or light liquid service (opened or otherwise had the seal broken): Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 within three months after being returned to organic HAP service or when it is reconnected. If monitoring detects a leak, repair according to the provisions of 40 CFR 63.174(d), as specified, except as provided in 40 CFR 63.174(c)(1)(ii). Subpart H. [40 CFR 63.174(c)(1)(i)]

Which Months: All Year Statistical Basis: None specified

Connectors in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(d)]

Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (c). Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(1)]

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Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of connectors as frequently as practicable during safe to monitor times, but not more frequently than the periodic schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(2)]

Which Months: All Year Statistical Basis: None specified  
 Connectors in gas/vapor service or light liquid service (unsafe-to-repair): Demonstrate that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d). Comply with this requirement instead of the requirements in 40 CFR 63.174(a), (d), and (e). Subpart H. [40 CFR 63.174(g)]

Connectors in gas/vapor service or light liquid service (inaccessible, ceramic, or ceramic-lined): Make a first attempt at repair within 5 days after leak is detected by visual, audible, olfactory or other means, and complete repairs no later than 15 calendar days after leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Comply with this requirement instead of the monitoring requirements of 40 CFR 63.174(a) and (c) and from the recordkeeping and reporting requirements of 40 CFR 63.181 and 63.182. Subpart H. [40 CFR 63.174(h)(2)]

Connectors in gas/vapor service or light liquid service: Calculate percent leaking connectors as specified in 40 CFR 63.174(i)(1) and (i)(2). Subpart H. [40 CFR 63.174(i)]  
 Comply with the test methods and procedures requirements provided in 40 CFR 63.180. Subpart H.

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 63.181(a) through (k). Subpart H.  
 Submit Initial Notification: Due within 120 days after the date of promulgation of the subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(b)(1). Subpart H. [40 CFR 63.182(b)]

Submit Notification of Compliance Status: Due within 90 days of the compliance dates specified in the 40 CFR 63 subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(c)(1) through (c)(3). Subpart H. [40 CFR 63.182(c)]  
 Submit Periodic Reports: Due semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c). Include the information specified in 40 CFR 63.182(d)(2) through (d)(4). Subpart H. [40 CFR 63.182(d)]  
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

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- 127 [40 CFR 60]
  - 128 [40 CFR 61.342(e)(2)(i)]  
 Benzene <= 6 Mg/yr (6.6 ton/yr), as determined in 40 CFR 61.355(k). Subpart FF. [40 CFR 61.342(e)(2)(i)]  
 Which Months: All Year Statistical Basis: None specified  
 Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
  - 129 [40 CFR 61.355]
  - 130 [40 CFR 61.356]
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (h), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.

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- 131 [40 CFR 61.]  
 132 [40 CFR 63.102(a)]  
 133 [40 CFR 63.103(b)(1)]  
 134 [40 CFR 63.103(b)(2)]  
 135 [40 CFR 63.103(b)(3)]  
 136 [40 CFR 63.103(c)(1)]  
 137 [40 CFR 63.103(c)(2)]  
 138 [40 CFR 63.103(c)]  
 139 [40 CFR 63.104(c)(3)]  
 140 [40 CFR 63.104(c)]  
 141 [40 CFR 63.104(d)]  
 142 [40 CFR 63.104(f)]  
 143 [40 CFR 63.105(d)]
- All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.  
 Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]  
 Conduct performance tests and compliance determinations according to the schedule and procedures in 40 CFR 63.7(a) and the applicable sections of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(b)(1)]  
 Submit Notification: Due at least 30 calendar days before a performance test is scheduled. Notify DEQ of the intention to conduct a performance test to allow DEQ the opportunity to have an observer present during the test. Subpart F. [40 CFR 63.103(b)(2)]  
 Conduct performance tests according to the provisions in 40 CFR 63.7(e) of subpart A, except conduct performance tests at maximum representative operating conditions for the process. Subpart F. [40 CFR 63.103(b)(3)]  
 Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]  
 Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Maintain records specified in 40 CFR 63.103(c)(2)(i) through (iii), as well as records specified in 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(c)(2)]  
 Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]  
 Heat exchange systems: Maintain, at all times, the monitoring plan currently in use. Maintain on-site, or accessible from a central location by computer or other means that provide access within 2 hours after a request. If a monitoring plan is superseded, retain the most recent superseded plan at least until 5 years from the date of its creation. Retain the superseded plan on-site (or accessible from a central location by computer or other means that provides access within 2 hours after a request) for at least 6 months after its creation. Subpart F. [40 CFR 63.104(c)(3)]  
 Heat exchange systems: Prepare and implement a monitoring plan that documents the procedures that will be used to detect leaks of process fluids into cooling water. Require monitoring of one or more surrogate indicators or monitoring of one or more process parameters or other conditions that indicate a leak. Include the information specified in 40 CFR 63.104(c)(1)(i) and (ii). Monitor no less frequently than monthly for the first six months and quarterly thereafter to detect leaks. If a substantial leak is identified by methods other than those described in the monitoring plan and method(s) specified in the plan could not detect the leak, revise the plan and document the basis for the changes. Complete revisions to the plan no later than 180 days after discovery of the leak. Subpart F. [40 CFR 63.104(c)]  
 Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d)]  
 Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Retain the records identified in 40 CFR 63.104(f)(1)(i) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]  
 Maintenance wastewater: Incorporate the procedures described in 40 CFR 63.105(b) and (c) as part of the start-up, shutdown and malfunction plan required under 40 CFR 63.6(e)(3). Subpart F. [40 CFR 63.105(d)]

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**UNF 0001 Entire Facility - Entire Facility**

Maintenance wastewater: Prepare a description of maintenance procedures for the management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair and during periods which are not shutdowns as specified in 40 CFR 63.105(b)(1) through (b)(3). Modify and update the information required by 40 CFR 63.105(b) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.

- Subpart F:
- All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A.
- 145 [40 CFR 63] Submit Title V permit application for renewal: Due 6 months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 146 [40 CFR 70.5(a)(1)(iii)] Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division.
- 147 [40 CFR 70.6(a)(3)(ii)(A)] Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 148 [40 CFR 70.6(c)(5)(iv)] Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 149 [LAC 33:III.21.11] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 150 [LAC 33:III.21.13.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.21.13.A.1-5.
- 151 [LAC 33:III.21.9] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 152 [LAC 33:III.51.05.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III. Chapter 51. Subchapter A, after the effective date of the standard.
- 153 [LAC 33:III.51.05.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- 154 [LAC 33:III.51.05.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 155 [LAC 33:III.51.05.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.
- 156 [LAC 33:III.51.07.A.2] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 157 [LAC 33:III.51.07.A.] Submit Annual Emissions Report: Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.

**SPECIFIC REQUIREMENTS**

AI ID: 17904 - Westlake Styrene LLC - Marine Terminal  
 Activity Number: PER20080002  
 Permit Number: 0520-00156-V2  
 Air - Title V Regular Permit Renewal

**UNF 001 Entire Facility - Entire Facility**

- 158 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 159 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.
- 160 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931.
- 161 [LAC 33:III.5107.B.4] Submit written report: Due to certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.i through B.4.a.viii.
- 162 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified.. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 163 [LAC 33:III.5113.A.1] Submit notification in writing: Due to SPOC not more than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 164 [LAC 33:III.5113.A.2] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 165 [LAC 33:III.535] Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537.
- 166 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert.
- 167 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.
- 168 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 7 when the administrative authority declares an Air Pollution Emergency.
- 169 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
- 170 [LAC 33:III.919.D] Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7.
- Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.

General Information

All ID: 17904 Westlake Styrene LLC - Marine Terminal  
 Activity Number: PER20080002  
 Permit Number: 0520-00156-Y2  
 Air - Title V Regular Permit Renewal

Also Known As:	ID	Name	User Group	Start Date
	0520-00156	Westlake Styrene LLC - Marine Terminal	CDS Number	08-05-2002
	76-0294926	Federal Tax ID	Federal Tax ID	11-20-1999
LAD985221951		Westlake Styrene LLC - Terminal	Hazardous Waste Notification	07-24-1992
LA0089362	LPDES #	LPDES Permit #	LPDES Permit #	05-22-2003
WP3695	LWDPS #	LWDPS Permit #	LWDPS Permit #	06-25-2003
		Westlake Styrene LLC	Multimedia	12-31-2007
G-019-3971	Priority 1 Emergency Site	Priority 1 Emergency Site	Priority 1 Emergency Site	07-19-2006
13881	Site ID #	Solid Waste Facility No.	Solid Waste Facility No.	11-21-1999
311749	Marine Terminal Facility	TEMPO Merge	TEMPO Merge	01-04-2001
70665WSTLK1820P	Westlake Styrene Corp	TEMPO Merge	TEMPO Merge	01-04-2001
	TRI #	Toxic Release Inventory	Toxic Release Inventory	07-09-2004
		Main FAX:	3375834996	
		Main Phone:	3375832200	
Physical Location:	Address:	Phone (Type)	Relationship	
1820 Pak Tank Rd	PO Box 2449 Sulphur, LA 70665	3375834996		
Mailing Address:	Address:	Phone (Type)	Relationship	
	PO Box 2449 Sulphur, LA 706642029	3375834996		
Location of Front Gate:	Address:	Phone (Type)	Relationship	
	30 148611 latitude, -93 343056 longitude, Coordinate Method: Lat/Long. - DMS, Coordinate Datum: NAD83	3375834996		
Related People:	Name	Mailing Address	Phone (Type)	Relationship
Jeff Walker	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375836982 (WF)	Responsible Official for
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375832200 (WP)	Responsible Official for
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375836982 (WF)	Water Permit Contact For
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375832200 (WP)	Water Permit Contact For
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375836982 (WF)	Water Permit Contact For
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375832200 (WP)	Air Permit Contact For
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375836982 (WF)	Air Permit Contact For
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375832200 (WP)	Air Permit Contact For
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375836982 (WF)	Haz. Waste Billing Party for
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375832200 (WP)	Hazardous Waste Permit Contact For
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375832200 (WP)	Hazardous Waste Permit Contact For
	Wayne Smith II	PO Box 2449 Sulphur, LA 706642449	3375836982 (WF)	Haz. Waste Billing Party for
	Jeff Walker	PO Box 2449 Sulphur, LA 706642449	3375833189 (WP)	Emission Inventory Contact for
	Jeff Walker	JWALKER@WESTL		Emission Inventory Contact for
Related Organizations:	Name	Address	Phone (Type)	Relationship
Westlake Styrene LLC	PO Box 2449 Sulphur, LA 70664	3375832200 (WP)	Owns	
Westlake Styrene LLC	PO Box 2449 Sulphur, LA 70664	3375832200 (WP)	Operates	

General Information

**AI ID:** 17904 Westlake Styrene LLC - Marine Terminal  
**Activity Number:** PER20080002  
**Permit Number:** 0520-00156-V2  
**Air - Title V Regular Permit Renewal**

Related Organizations:	Name	Address	Phone (Type)	Relationship
Westlake Styrene LLC	PO Box 2449 Sulphur, LA 70664	3375832200 (WP)	Air Billing Party for	
Westlake Styrene LLC	PO Box 2449 Sulphur, LA 70664	3375832200 (WP)	Water Billing Party for	
Westlake Styrene LP	PO Box 2449 Sulphur, LA 70664	3375832200 (WP)	Emission Inventory Billing Party	

**NAIC Codes:**

424690, Other Chemical and Allied Products Merchant Wholesalers

**Note:** This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit.  
 Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Miliam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

**INVENTORIES**

**AI ID:** 17904 - Westlake Styrene LLC - Marine Terminal  
**Activity Number:** PER20080002  
**Permit Number:** 0520-00156-V2  
**Air - Title V Regular Permit Renewal**

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
<b>Entire Facility</b>						
EQT 0001	1-90 - Benzene Storage Tank MT-704A	1.47 million gallons	83 MM gallons/yr	83 MM gallons/yr		8760 hr/yr
EQT 0002	2-90 - Styrene Monomer Storage Tank MT-700	4.84 million gallons	99 MM gallons/yr	99 MM gallons/yr		8760 hr/yr
EQT 0003	4-90 - Contaminated Stormwater Storage Tank MT-709	5288 gallons	95184 gallons/yr	95184 gallons/yr		8760 hr/yr
EQT 0004	5b-90 - Barge Loading/Unloading Operation		99 MM gallons/yr	99 MM gallons/yr		8760 hr/yr
EQT 0005	8-90 - Emergency Diesel Firewater Pump		660 horsepower	660 horsepower		156 hr/yr
EQT 0006	10-90 - Ship Dock Collection Sump	500 gallons	42662 gallons/yr	42662 gallons/yr		8760 hr/yr
EQT 0007	12-90 - Terminal Facility Collection Sump	500 gallons	42662 gallons/yr	42662 gallons/yr		8760 hr/yr
EQT 0008	1-07 - Py Gas Loading Flare		51.56 MM BTU/hr	1.09 MM BTU/hr		8760 hr/yr
EQT 0009	2-07 - Rail Car Loading		200 gallons/min	13.5 MM gallons/yr		8760 hr/yr
FUG 0001	6-90 - Fugitive Hydrocarbon Emissions					8760 hr/yr

**Stack Information:**

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
<b>Entire Facility</b>							
EQT 0001	1-90 - Benzene Storage Tank MT-704A			25		48	80
EQT 0002	2-90 - Styrene Monomer Storage Tank MT-700			25		48	80
EQT 0003	4-90 - Contaminated Stormwater Storage Tank MT-709			25		12	80
EQT 0004	5b-90 - Barge Loading/Unloading Operation			67		50	80
EQT 0005	8-90 - Emergency Diesel Firewater Pump			1.24	11.41	15	900
EQT 0006	10-90 - Ship Dock Collection Sump			5		6	80
EQT 0007	12-90 - Terminal Facility Collection Sump			5		6	80
EQT 0008	1-07 - Py Gas Loading Flare			2.6		30	300
EQT 0009	2-07 - Rail Car Loading			25		6	-

**Relationships:****Subject Item Groups:**

ID	Group Type	Group Description
UNF 0001	Unit or Facility Wide	Entire Facility - Entire Facility

**Group Membership:**

**NOTE:** The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

INVENTORIES

AI ID: 17904 - Westlake Styrene LLC - Marine Terminal  
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## Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multplier	Units Of Measure
1360	1360 D) Petroleum, Chemical Bulk Storage and Terminal (500,000 BBL Capacity or Less)		

## SIC Codes:

4226	Special warehousing and storage, nec	AI 17904
4491	Marine cargo handling	AI 17904